

LIONEL Z. GLANCY
PETER BINKOW
ANDY SOHRN
GLANCY BINKOW & GOLDBERG LLP
1801 Avenue of the Stars, Suite 311
Los Angeles, California 90067
Telephone: (310) 201-9150
Facsimile: (310) 201-9160

FEDERMAN & SHERWOOD
WILLIAM B. FEDERMAN (admitted *Pro Hac Vice*)
10205 North Pennsylvania Ave.
Oklahoma City, Oklahoma 73120
Telephone: (405) 235-1560
Facsimile: (405) 239-2112

THE LAW OFFICE OF JACOB SABO
JACOB SABO
The Tower, No. 3 Daniel Frisch St
15th Floor
Tel Aviv, Israel 64731
Telephone: 011 972 3 607 88 88
Facsimile: 011 972 3 607 88 89

CO-LEAD COUNSEL FOR PLAINTIFFS

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE ALVARION LTD.
SECURITIES LITIGATION

CASE NO.: 3:07-cv-00374-JSW

STIPULATION AND ~~PROPOSED~~
ORDER SETTING BRIEFING
SCHEDULE AND CONTINUING
CASE MANAGEMENT
CONFERENCE

1 WHEREAS, on September 20, 2007, this Court issued an order rescheduling the Case
2 Management Conference from September 21, 2007 to November 9, 2007 at 1:30pm PST and
3 ordered Plaintiffs to file a motion or stipulation to appoint lead plaintiff and lead counsel by no
4 later than October 12, 2007;

5 WHEREAS, on October 12, 2007, Plaintiffs Furkan M. Khan and Rahul Saraf filed a
6 Stipulation requesting this Court appoint them as Co-Lead Plaintiffs and that their choice of
7 counsel, Glancy Binkow & Goldberg LLP, the Law Office of Jacob Sabo and Federman &
8 Sherwood, be appointed Co-Lead Counsel for the above consolidated action;

9 WHEREAS, on October 30, 2007, this Court issued an order and appointed Furkan M.
10 Khan and Rahul Saraf as Co-Lead Plaintiffs and the law firms of Glancy Binkow & Goldberg
11 LLP, The Law Office of Jacob Sabo and Federman & Sherwood as Co-Lead Counsel for the
12 above consolidated action and ordered Co-Lead Plaintiffs to file an Amended Consolidated
13 Complaint no later than sixty (60) days after the effective date of that Order;

14 WHEREAS, Co-Lead Plaintiffs' Amended Consolidated Complaint is currently due on
15 or before December 30, 2007;

16 WHEREAS, the parties in this action have conferred and agree it is in their mutual
17 interest to extend time for Co-Lead Plaintiffs to file their Amended Consolidated Complaint
18 (*inter alia* to avoid the year-end holidays) and set a briefing schedule for Defendants' anticipated
19 Motion to Dismiss, Plaintiffs' opposition thereto and Defendants' Reply to Plaintiffs'
20 Opposition;

21 WHEREAS, the parties in this action have conferred and agree that it would be
22 premature to discuss case management issues before the filing of Co-Lead Plaintiffs' Amended
23 Consolidated Complaint and the briefing of Defendants' anticipated motion to dismiss that
24 Complaint, and agree that the Case Management Conference currently scheduled for November
25 9, 2007 at 1:30pm PST be taken off calendar and rescheduled to occur at the same time as the
26 hearing on Defendants' Motion to Dismiss; and

27 WHEREAS, the proposed briefing schedule and the rescheduling of the Case
28 Management Conference will not cause undue delay;

IT IS THEREFORE STIPULATED AND AGREED THAT:

1. Co-Lead Plaintiffs will file their Amended Consolidated Complaint on or before January 14, 2008;
2. Defendants will file their Motion to Dismiss the Amended Consolidated Complaint on or before March 3, 2008;
3. Co-Lead Plaintiffs will file their Opposition to Defendants' Motion to Dismiss on or before April 3, 2008;
4. Defendants will file their reply memorandum in support of their Motion to Dismiss the Amended Consolidated Complaint on or before April 24, 2008; and
5. The Case Management Conference scheduled for 1:30pm PST on November 9, 2007 shall be taken off calendar and rescheduled to occur at the same time as the hearing on Defendants' Motion to Dismiss or at another time convenient for the Court.

Dated: November 1, 2007

GLANCY BINKOW & GOLDBERG LLP

By: /s/ Peter Binkow
Peter Binkow

FEDERMAN & SHERWOOD
William B. Federman

THE LAW OFFICE OF JACOB SABO
Jacob Sabo

Co-Lead Counsel for Plaintiffs

Dated: November 1, 2007

WILSON SONSINI GOODRICH & ROSATI

By: /s/ Rodney G. Strickland, Jr.
Rodney G. Strickland, Jr.

Attorneys for Defendants Alvarion Ltd., Zvi Slonimsky
and Dafna Gruber

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3 I, Peter Binkow, am the ECF user whose identification and password are being used
4 to file the Stipulation and [Proposed] Order Setting Briefing Schedule and Continuing Case
5 Management Conference. In compliance with General Order 45.X.B, I hereby attest that
6 William B. Federman, Jacob Sabo and Rodney Strickland have concurred in this filing.

7 Dated: November 2, 2007

GLANCY BINKOW & GOLDBERG LLP


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9 By: /s/ Peter Binkow
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[PROPOSED] ORDER

PURSUANT TO THE FOREGOING STIPULATION, IT IS SO ORDERED THAT:

1. Co-Lead Plaintiffs will file their Amended Consolidated Complaint on or before January 14, 2008;
2. Defendants will file their Motion to Dismiss the Amended Consolidated Complaint on or before March 3, 2008;
3. Co-Lead Plaintiffs will file their Opposition to Defendants' Motion to Dismiss on or before April 3, 2008;
4. Defendants will file their reply memorandum in support of their Motion to Dismiss the Amended Consolidated Complaint on or before April 24, 2008; and
5. The Case Management Conference scheduled for 1:30pm PST on November 9, 2007 shall be taken off calendar and rescheduled to occur at the same time as the hearing on Defendants' Motion to Dismiss, which is HEREBY scheduled for May 16, 2008 at 9:00 a.m.

DATED: November 5, 2007


Hon. Jeffrey S. White
U.S. District Court Judge